



U.S. Department of Justice

*United States Attorney
District of New Jersey
Special Prosecutions Division*

970 Broad Street, Suite 700
Newark, NJ 07102

(973) 645-6112

September 10, 2020

The Honorable John M. Vazquez
United States District Judge
District of New Jersey
Frank Lautenberg U.S. Courthouse
& Post Office Building
Newark, New Jersey 07101

Re: *United States v. Gicella Sanchez*

Dear Judge Vazquez:

This letter provides the parties' joint response to the Court's September 8, 2020 order regarding the plea hearing in the above-referenced case, currently scheduled for September 29, 2020 at 12:00 p.m.

Gicella Sanchez has consulted with counsel and agrees to proceed with the plea hearing via videoconference. The parties submit that the plea hearing cannot be further delayed without serious harm to the interests of justice for six independent reasons:

- First, as Chief Judge Wolfson recognized in Standing Order 2020-06 and as this Court noted in its September 8, 2020 order, such proceedings cannot be conducted in person without seriously jeopardizing public health and safety;
- Second, conducting the plea hearing now will ensure that the Court is not overwhelmed by cases and proceedings at the conclusion of this period of emergency;
- Third, proceeding with the plea hearing will permit Ms. Sanchez to obtain a speedy resolution of her case through an admission of guilt;

- Fourth, a timely plea hearing will enable victims of the offense the ability to obtain a speedy determination of guilt/responsibility for the harm caused to them and to obtain restitution for the crime committed against them;
- Fifth, conducting the plea hearing now will allow the Government to obtain a resolution of the case so that the Government, already operating in a restricted capacity due to the emergency, may appropriately focus its resources on other, emerging criminal matters; and
- Sixth, proceeding with the plea hearing will allow the Government to obtain a resolution before the running of the applicable statute of limitations.

For all of the foregoing reasons, the parties jointly request that the Court proceed with the plea hearing via videoconference on September 29, 2020 at 12:00 p.m.

Respectfully submitted

CRAIG CARPENITO
United States Attorney

/s/ Sean Farrell

By: Sean Farrell
Assistant United States Attorney

cc: Daniel J. Welsh, Esq.
Michele Roman, Supervisory U.S. Pretrial Services Officer